Case 20-10324 Doc 82 Filed 04/30/20 Entered 04/30/20 11:15:50 Desc Main Document Page 1 of 7

UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

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CASE NO.: 20-10324 2020 APR 30 A 10: 35

Chapter: 7

BARRY WISNER CHAPIN xxx-xx-6215

DEB	TOR		

BACKER ABOUD POLIAKOFF & FOELSTER, LLP'S, MOTION TO APPEAR PRO
HAC VICE ON BEHALF OF CREDITOR, OCEAN CITY LOFTS CONDOMINIUM
ASSOCIATION, INC. AND CERTIFICATE OF ATTORNEY

Backer Aboud Poliakoff & Foelster, LLP, counsel to Creditor, OCEAN CITY LOFTS CONDOMINIUM ASSOCIATION, INC., hereafter referred to as "Association," moves the Court for an Order authorizing it to appear pro hac vice on behalf of the Association and, as grounds therefore, states:

- 1. Association is a Florida condominium association and a corporation not-for-profit pursuant to Chapters 718 and 617, Fla. Stat.
- 2. Debtor had previously owned a condominium unit located at 185 NE 4th Ave., Unit 210, Delray Beach, FL 33483 in the Association's condominium community, hereafter referred to as "Subject Unit."
- Debtor lost his right to redeem the unit in the context of the Association's State Court lien foreclosure action to collect delinquent condominium association assessments filed in Case No. 502019CA003451XXXXMB in the Circuit Court in the 15th Judicial Circuit in and for Palm Beach County, Florida and the property was sold to a third party high bidder, 104 Andover Court, LLC, at the Association's lien foreclosure sale; however, Debtor has erroneously indicated in his schedules filed herein (ECF No. 23) that he remains the record owner of the Subject Unit.

- 4. The Association desires to appear in these proceedings to protect its interests.
- 5. Undersigned counsel certifies that he is a member of and in good standing with The Florida Bar.
- 6. Undersigned counsel certifies that he has been admitted to practice in the United States District Court for the Southern and Middle Districts of Florida and that his admission is in good standing.
- 7. Undersigned counsel certifies that there are no disciplinary proceedings pending against undersigned counsel as a member of the bar in any jurisdiction in which he is admitted.
- 8. Undersigned counsel certifies that he is familiar with the Local Rules of the Court;
- 9. Undersigned counsel certifies that he has paid the applicable pro hac vice fee. A true and correct copy of the proof of payment is attached hereto as Exhibit "A."

WHEREFORE, BACKER ABOUD POLIAKOFF & FOELSTER, LLP and Ryan M.

Aboud, Esq., respectfully requests that the Court grant this Motion and authorize them to appear pro hac vice on behalf of Creditor, OCEAN CITY LOFTS CONDOMINIUM ASSOCIATION, INC.

(This space intentionally left blank)

I, Ryan M. Aboud, Esq., certify that I filed the foregoing document with the United States Bankruptcy Court for the District of Massachusetts on behalf of Backer Aboud Poliakoff & Foelster and Creditor, OCEAN CITY LOFTS CONDOMINIUM ASSOCIATION, INC. and that copies were served upon the parties via regular U.S. Mail as indicated on the Creditor Matrix attached hereto as Exhibit "B" this 29th day of April, 2020.

Respectfully Submitted,
Backer Aboud Poliakoff & Foelster, LL
The Arbor Suite 420
400 S. Dixie Highway
Boca Raton FL 33432
(561) 361-8535 Voice
(561) 361-3491 Fax
By:/s/Ryan M. Aboud, Esq.
FBN: 27366

Email: RAboud@BAPFLaw.com
Counsel for OCEAN CITY LOFTS
CONDOMINIUM ASSOCIATION, INC.

Exhibit "A"

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

U.S. Bankruptcy Court Pro Hac Vice Fees

Pro Hac Vice Fees Successfully Collected

You have successfully completed your payment for the Pro Hac Vice fees on behalf of the United States Bankruptcy Court for the District of Massachusetts

Receipt Number:	phv-16548-1588187040	
Bankruptcy Case Number:	20-10324	
Case Name:	Barry Wisner Chapin	
Attorney Name:	Ryan M Aboud	
Street Address:	400 South Dixie Highway Suite 420	<u> </u>
City, State Zip Code:	Boca Raton FL 33432	
Email Address:	RAboud@BAPFLaw.com	
Payment Date:	Wed Apr 29 15:06:53 EDT 2020	

Notice: The U. S. Bankruptcy Court will be notified of your payment status within 24 hours. You will receive an email confirmation when they have been notified.

Return To U.S. Bankruptcy Court Website

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l. S. Bankruptcy Court

1.W. McCormack Post Office & Court House

mSher Collection Services, Inc. 524 Southlake Pkwy Ste. 15 irmingham, AL 35244-3271

Post Office Square, Suite 1150

ioston, MA 02109-3945

merican Express National Bank, AENB !/o Zwicker & Associates, P.C. !O Minuteman Road !O. Box 9043 andover, MA 01810-0943

ank Of The West 3505 California Street Maha, NE 68154-5247

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olumbus B&T/Synovus B O Box 120 olumbus, GA 31902-0120

elray Beach Tax Collector 01 S. Congress Avenue elray Beach, FL 33445-4620

erris Development 25 Donald Lynch Blvd. #200 Marlborough, MA 01752-4711

reedom Mortgage O Box 50485 Indianapolis, IN 46250-0485 Doc 82 Filed 04/30/20 Entered 04/30/20 11:15:50 Desc Main Board of Trustees of 32-34 Fairfield 94/30/20 11:15:50 Desc Main Stocker Filed A. Shapiro, Esquire 5 of 7 55 Main St Marcus Errico Emmer Brookes Hingham, Ma 02043-2590 45 Braintree Hill Office Park Suite 107

32-34 Fairfield Street Condo. Assn c/o Modica Associates 131 Park Drive Boston, MA 02215-5171

American Express PO Box 981537 El Paso, TX 79998-1537

Braintree, MA 02184-8740

Miami, FL 33132-2131

Ariana Fajardo Orshan, Esq.

99 NE 4th Street

Capital One Bank PO Box 30281 Salt Lake City, UT 84130-0281

Claire Chapin 25 Olde Coach Road Westborough, MA 01581-3106

Comcast One Comcast Center Philadelphia, PA 19103-2899

Dennis M. Bottone, Esq. Bottone Reiling 63 Atlantic Avenue 3rd Floor Boston, MA 02110-3752

Ferris Development Group, LLC 325 Donald Lynch Blve Ste 200 Marlborough, MA 01752-4711

Gaughen, Gaughen, Lane & Hernando, LLP 528 Broad Street East Weymouth, MA 02189-1303 AT&T 4331 Communications Dr. Flr 4W Dallas, TX 75211-1300

American Express National Bank c/o Zwicker and Associates, P.C. 80 Minuteman Road Andover, MA 01810-1008

Astor Condo Assoc. Inc. c/o First Service Residential 2590 N. 28th Terr. Hollywood, FL 33020

Carlton Gardens Condo. Assoc. c/o Northborough Property Management 27 South Street Northborough, MA 01532-2664

Claire M. Chapin 25 Olde Coach Rd. Westboro, MA 01581-3106

Constantine Karnis 40 Tilegate Gld Fairport, NY 14450-1718

Eversource Electric 300 Cadwell Drive Springfield, MA 01104-1742

Floridian Community Bank 14235 US Highway One June Beach, FL 33408-1405

Houssam Alkoury, DMD Simply Orthodontics 77 W. Main Street #209 Hopkinton, MA 01748-1663 INITIAL D Case 20-10324 nternal Revenue Service 0 Box 7346 hiladelphia, PA 19101-7346

(p) The Class Bank Page 6 of 7 BANKRUPTCY MAIL INTAKE TEAM 700 KANSAS LANE FLOOR 01 MONROE LA 71203-4774

Doc 82

Entered 04/30/20 11:15:50 Desc Main
JPMorgan Chase Bank, N.A.

c/o Robertson, Anschutz & Schneid,
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487-2853

Voanne Graf !/o Ross B. Gampel, Esq. 728 Coral Way, Ste 700 liami, FL 33145-2794 Keith F. Backer, Esq. Backer Aboud Poliakoff & Foelster 400 South Dixie Highway Boca Raton, FL 33432-5518 Linda Reyes-Flores c/o Dennis Bottone, Esq. 63 Atlantic Avenue 3rd Floor Boston, MA 02110-3752

.canCare LLC .637 Semtara Way ste 303 'irginia Beach, VA 23452-4262 MDOR Child Support Unit 100 Cambridge Street Boston, MA 02114-2509 Mark Schupara 40 Battery St, PH 4 Boston, MA 02109-1906

lass. Dept. of Revenue Attn: Bankruptcy Unit '.O. Box 9564 loston, MA 02114-9564 Massachusetts Dept of Revenue PO Box 9564 Boston, MA 02114-9564 National Grid 300 Erie Boulevard West Syracuse, NY 13202-4250

lational grid .ttn; Christophewr Aronson, Esq. 0 Sylvan Road /altham, MA 02451-1120 Ocean City Lofts c/o First Service Residential 1855 Griffin Road, Ste A-330 Dania, FL 33004-2365 Pamela M. Jonah, Esq. Marcus, Errico, Emmer & Brooks PC 45 Braintree Hill Office Park Ste 107 Braintree, MA 02184-8740

adosveta Rizzo 495 Graud Est. Way oca Raton, FL 33496-1027 Synovus Bank c/o Thompson, O'Brien, Kemp and Nas 40 Technology Parkway South Suite 300 Peachtree Corners, GA 30092-2924 Synovus Bank/Dovenmuele Mortgage 1 Corporate Dr. Ste. 360 Lake Zurich, IL 60047-8945

own of Westborough 4 West Main Street lestborough, MA 01581-1998 Barry Wisner Chapin 34 Farfield Apt. 2 Boston, MA 02116-2587 Craig R. Jalbert Verdolino & Lowey, P.C. 124 Washington Street Foxboro, MA 02035-1368

avid G. Baker :36 Huntington Avenue, Ste. 317 loston, MA 02115-4701 Harold B. Murphy Murphy & King, P.C. One Beacon Street Boston, MA 02108-3107 John Fitzgerald
Office of the US Trustee
J.W. McCormack Post Office & Courthouse
5 Post Office Sq., 10th F1, Suite 1000
Boston, MA 02109-3901

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

u) Carlton Gardens Condominium Trust

(u) Freedom Mortgage Corporation

(d) Hingham Institution for Savings

55 Main Street

Hingham, MA 02043-2590

u)Linda Reyes-Flores

End of Label Matrix

Mailable recipients 53

Bypassed recipients 4

Total 57